



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**

**OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES**

Memorandum

From: Larry Turner, Ph. D. /s/ 12-1-03
Environmental Field Branch
Field and External Affairs Division

To: Arthur-Jean Williams, Chief
Environmental Field Branch
Field and External Affairs Division

Subject: Effects Determination for Phosmet for Pacific Anadromous Salmonids

I reviewed data and other information for phosmet, an organophosphate insecticide named by the Washington Toxics Coalition (WTC) and included in the court order for 'effects determinations' and potential consultation with the National Marine Fisheries Service. Phosmet is registered nationally for use on many fruit and nut crops, along with alfalfa, potatoes, peas, and a few other crops. It is also used on livestock in certain areas of the country. The Environmental Fate and Effects Division (EFED) completed an environmental risk assessment in 1998 which was used in an Interim Reregistration Eligibility Decision (RED) issued in October, 2001. The assessment concludes that levels of concern are exceeded for endangered freshwater fish and populations of aquatic invertebrates exposed to runoff and drift from agricultural treatment sites. We have adapted the more general findings of the EFED assessment to develop an analysis of the potential for effects on endangered and threatened Pacific salmon and steelhead Evolutionary Significant Units (ESUs) from current uses in California and the Pacific Northwest.

Based on the environmental risk assessment and additional considerations indicated in our analysis and other attached or referenced materials, I conclude that the use of phosmet may affect, but is not likely to adversely affect 13 ESUs of listed Pacific salmon and steelhead, and will have no effect on 13 other ESUs. My determinations are based on the known or potential use of phosmet on crops within habitats and migration corridors of each ESU, the acute risk of phosmet to endangered fish, and the expected bioavailability of phosmet.

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